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ATTORNEY FOR DEFENDANT KENNETH MEDENBACH

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA, Plaintiff,

Case No. 3:16-CR-00051-16-BR

MOTION FOR ORDER MODIFYING CONDITIONS OF PRETRIAL RELEASE

VS.

KENNETH MEDENBACH,

Defendant(s).

Defendant, Kenneth Medenbach, through standby counsel, Matthew Schindler, moves the Court for an order modifying the condition of his pretrial release as well as the similar condition imposed on other defendants that they not have contact with one another. Counsel for Mr. Medenbach conferred with the government and was advised that it had no objection to this request to allow contact with co-defendants in the September 7 trial.

Because Mr. Medenbach is pro se and other defendants are pro se they need to have contact with one another that does not necessarily involve an attorney without violating their pretrial release. In addition, during the preparation for trial and during this trial it is essential that defendants and not just attorneys be able to

jointly discuss trial issues. As a defense group we need to be able to come together

without fearing that it violates pretrial release conditions.

Mr. Medenbach requests the court modify his conditions of release to allow

contact with his September 7 trial co-defendants for the purpose of preparing for

trial.

Respectfully submitted on August 4, 2016.

Matthew A. Schindler, OSB#964190 Standby counsel for Kenneth Medenbach